



# WASHINGTON REALTORS®

October 14, 2022

Mr. Anthony Doan, Washington SBCC Chair  
Members, SBCC  
c/o Stoyan Bumbalov, Managing Director  
WA State Building Code Council  
Dept. of Enterprise Services  
1500 Jefferson Avenue S.E.  
P.O. Box 41449  
Olympia, Washington 98504-1449

RE: International Wildland Urban Interface Code (IWUIC) Comment Letter

Dear Mr. Doan,

Washington REALTORS® represents thousands of residential and commercial real estate professionals, their clients, and those affiliated with the real estate industry. We are committed to the principles of sustainability and conservation and support efforts to protect properties from the impacts of natural hazards such as wildfires.

Throughout the state, fires have done much damage in several communities over the last few years, and we understand the need to update the WUI code in light of the population that is living in forested as well as grassy/shrub lands near communities. We support Firewise and other programs to educate home and business owners on various steps to protect their properties from fire damage and the potential loss of life.

That said, we cannot support the adoption of the proposed International Wildland Urban Interface Code proposal.

We appreciate the work that led to the proposal before you and the proposed modifications in the Micah Chappell letter to the Council dated September 28, 2022, on behalf of Washington Association of Building Officials (WABO) and Washington State Association of Fire Marshals (WSAFM). We do, however, have the following concerns with this code proposal:



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- **TAG Process:** The Technical Advisory Committee (TAG) did not have sufficient time to truly vet the proposal since the TAG only met twice. The TAG work timeline compressed into an extremely short window of time. The review was a total of six hours in three-hour segments on two different days within a week's time.
- **Mapping Tool:** The mapping is too broad and not detailed enough to determine which properties are in or out of wildland designation areas and subject to the code.
- **Decision-making:** As written, Section 302 of the proposal takes local legislative bodies out of the role of adopting the DNR Wildland maps.
- **Implementation:** The TAG should spend more time to ensure the requirements are written in a clear and concise manner so property owners and others can easily understand the code requirements. Any appeal should be subject to criteria specified in the code for the body reviewing the appeal.
- **Legislative Guidance:** In 2018, the legislature passed ESSB 6109, that selected certain sections of the 2018 WUIC. The bill sets out the baseline minimum requirements needed, and the legislature purposely did not adopt the entire code. Instead, the bill selected minimal portions of the Wildland-Urban Interface Code that are common steps in protecting homes from fire.

We understand that an effort was made to go through the legislative process last session but due to the amount of legislation under consideration legislation to modify the WUIC was not accepted. That said, the 2018 legislation was clear about the sections of the International Code Council's 2018 IWUIC to adopt. In addition, the legislation allowed "(2) All counties, cities, and towns may adopt the International Urban Interface Code, published by the International Code Council, Inc., or any portion thereof."

Therefore, we believe the Council would exceed the authority granted by the Legislature should the code proposal be adopted.



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For these reasons, Washington REALTORS® recommends the State Building Code not adopt the proposed WUIC at this time. We believe the Council should send the proposal back to the TAG to revise the proposal and work on a revised proposal for the Council's consideration next year. Meanwhile, proponents can once again seek revisions to the adopted WUIC legislation.

Sincerely,  
Washington REALTORS®

*Jeanette McKague*

Jeanette McKague  
Assistant Director of Housing & Community Development



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